

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Modernizing the E-Rate Program for Schools and Libraries)	WC Docket No. 13-184
)	

**REPLY COMMENTS OF THE INFORMATION TECHNOLOGY
INDUSTRY COUNCIL**

The Information Technology Industry Council (ITI)¹ appreciates the opportunity to submit these reply comments to the U.S. Federal Communications Commission (FCC or Commission) in response to comments filed in the above-captioned matter.

ITI is the premier global advocate for technology, representing the world’s most innovative companies, which provide a range of services, products, and devices that beneficiaries of the schools and libraries universal support mechanism (commonly known as the E-Rate program) rely upon to provide broadband access and network security for schools and local communities across the country. Our diverse membership and expert staff provide policymakers the broadest perspective and thought leadership from technology, hardware, software, services, and related industries.

According to industry analysis, over 19 million children in the United States live in households that are not connected to the Internet at broadband speeds.² The Covid-19 pandemic

¹ Founded in 1916, ITI is an international trade association with a team of professionals on four continents. We promote public policies and industry standards that advance competition and innovation worldwide.

² Letter from Paula Boyd, Senior Director, Microsoft, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-184 (filed May 6, 2021) (Microsoft *Ex Parte*).

and the resulting surge in remote learning opportunities and challenges brought disparities in access to broadband among school age children into even sharper focus. As important as connectivity has been for schools and libraries historically, at no time in the digital era have the needs been greater. And, as a result of the shift to greater reliance on digital tools to access the workforce and educational opportunities, the school and library networks that serve millions of Americans have become even more susceptible to cybersecurity threats. As such, two areas in particular stand out as being ripe for Commission consideration—network security and Wi-Fi hotspots on school buses. ITI supports the views of commenters requesting that the Commission clarify both are E-Rate eligible expenses.

In the second half of 2020, ransomware attacks against K-12 schools increased dramatically, making up over half of reported ransomware incidents.³ While many schools and libraries have returned to in-person learning and study by the start of this school year, the necessity of securing their networks using tools stronger than basic firewalls has proven to be essential nonetheless.⁴ These institutions maintain a significant amount of personally identifiable information and, despite being sensitive targets, are often forced to rely on unsecured IT infrastructure due to constrained budgets. Hardworking IT staff battle daily to secure these networks, but they often lack the resources needed to adequately confront sophisticated attackers. The widely reported examples of attacks that have completely shut down schools' core networks, seemingly an almost weekly occurrence, illustrate just how susceptible these networks are. Crippling attacks on these vulnerable networks disrupt the educational goals of the E-Rate program, can result in the release of sensitive information, and are extremely expensive to

³ Joint Cybersecurity Advisory, *Cyber Actors Target K-12 Distance Learning Education to Cause Disruptions and Steal Data* (Dec. 10, 2020), https://us-cert.cisa.gov/sites/default/files/publications/AA20-345A_Joint_Cybersecurity_Advisory_Distance_Learning_S508C.pdf.

⁴ See Fortinet Comments.

remedy.⁵ Modern cybersecurity solutions are available to counter this threat, and ITI would encourage the Commission to consider ways to bolster network security by clarifying the scope of the FY2022 E-Rate eligible services list (ESL).⁶

In addition to the general shift toward distance learning in recent years, schools and libraries are no longer expected to simply provide hardwired, desktop systems for students and patrons, but many have rightfully embraced the use of wireless devices and related technologies. The shift to mobile connectivity has so permeated our society that it is sometimes taken for granted, but for those living in communities with unserved or underserved households, accessing wireless connectivity outside the home has become a necessity. Numerous reports over the last 18 months have highlighted instances where public Wi-Fi hotspots on school buses provided these essential Internet connections.⁷

While providing this service on an emergency basis was vitally important during the pandemic, assumptions about where and how students learn are no longer limited exclusively to the confines of a physical building, so the recent successes of Wi-Fi enabled buses demonstrate just how important that functionality will continue to be for students who may lack broadband at home. The extra minutes and hours of connectivity provided to students traveling to and from school directly contribute toward meeting the goals of the E-Rate program, and ITI would encourage the Commission to amend the ESL to clarify that the costs of providing school bus Wi-Fi are supported by the program.

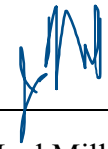
⁵ See NCTA Comments at 2.

⁶ See, e.g., Fortinet Comments at 15 and NCTA Comments at 3.

⁷ See SHLB Comments at 2.

In conclusion, the record in this proceeding has elicited important comments regarding the exigency of clarifying that network security and Wi-Fi-enabled school buses qualify for E-Rate eligibility, and ITI would support the Commission's consideration of these requests.

Respectfully submitted,

By: _____

Joel Miller
Senior Director of Policy
Information Technology Industry Council
700 K St NW
Suite 600
Washington, D.C. 20001

October 12, 2021